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Draft Chesapeake Bay Total Maximum Daily Load

Comment On: EPA-R03-OW-2010-0736-0001

Clean Water Act Section 303(d): Notice for the Public Review of the Draft Total Maximum Daily Load (TMDL) for the Chesapeake Bay

Document: EPA-R03-OW-2010-0736-0107

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Submitter Information

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General Comment

Coastal Canoeists (coastals.org) supports clean water in the Chesapeake Bay and its tributaries. As members of a recreational paddling club in Virginia, the quality of Chesapeake Bay waters is important to us. We also support measures to protect the scenic quality of the waters we paddle and their ability to sustain wildlife.

We ask that livestock fencing be a required practice, and that 35 foot forested buffers be established and maintained on all perennial streams, including those later developed. We support mandating effective Best Management Practices for all farms receiving manure or sludge. Animal feeding operations should be regulated as a point source.

Virginia should not delay implementation of needed 2-year milestones in order to "study" expanded nutrient trading or algae in James River.

Prohibit new construction on the 100 year floodplain or within 100 feet of a perennial stream or within 25 feet of an intermittent stream. These measures would protect property investment too.

MS4 programs should be expanded as needed to assure improvements in runoff from developed areas.

Paddlers can swim or flip and roll and there have been many cases of infections coming from water contact that could be minimized if the Chesapeake Bay TMDL is actually put in place.

Strong stormwater regulations on new construction should be implemented immediately. Virginia dropped the ball on this and should implement the regulations as drafted in September 2009 before they were amended to weaken and delay them. New VDOT construction and any improvements that increase impervious areas should have strict stormwater standards.

If Virginia does not enact strong measures to stop non-point pollution from the above sources we want EPA to take steps to not let water cleanup get behind schedule. We know the American Canoe Association sued EPA 11 years ago to force a water cleanup in Virginia. That case was won by ACA and failure to clean Virginia waters is not an option.